

**REMARKS**

Favorable reconsideration and allowance of the subject application are respectfully requested in view of the following remarks.

**Summary of the Office Action**

Claims 1, 2, 5-8, 22 and 23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Sawatsubashi et al.* (U.S. Patent No. 5,148,301) in view of *Wakai et al.* (U.S. Patent No. 5,166,085).

**Summary of the Response to the Office Action**

Claim 22 has been canceled without prejudice or disclaimer. Claim 1 has been amended by this amendment. Accordingly, claims 1, 2, 5-21 and 23 are currently pending, with claims 1, 2, 5-8, and 23 being under consideration.

**Claim Rejection Under 35 U.S.C. §103(a)**

Claims 1, 2, 5-8, 22 and 23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Sawatsubashi et al.* in view of *Wakai et al.*

With regard to claim 22, Applicants respectfully request withdrawal of the rejection of claim 22 as the cancellation of claim 22 renders the rejection moot.

With regard to claims 1, 2, 5-8 and 23, to the extent that the rejection may be applied to these claims, as newly-amended, it is respectfully traversed for at least the following reasons.

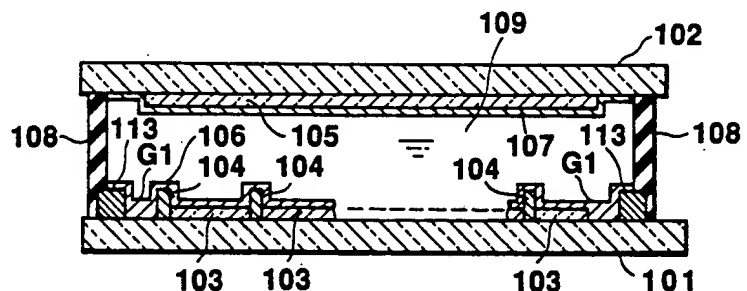
Applicants respectfully submit that *Sawatsubashi et al.* and *Wakai et al.*, whether taken separately or in combination, fail to teach or suggest every feature of claims 1, 2, 5-8, and 23. For example, it is respectfully submitted neither *Sawatsubashi et al.* nor *Wakai et al.* teaches or suggests the claimed combination as set forth in independent claim 1, as newly-amended, including at least “a seal pattern formed peripherally to said active area surrounding the electrode

pattern, and contacting said first substrate and said second substrate, wherein the electrode pattern is completely embedded within the seal pattern.”

At paragraph 2, lines 10-11, the Final Office Action states that “Sawa discloses the electrode pattern contacting (/embedded within) the seal pattern (Figures 3-4).” However, in contrast to the Final Office Action’s assertion, Applicants respectfully submit that FIGs. 3-4 of *Sawatsubashi et al.* and other portions of *Sawatsubashi et al.*’s disclosure do not teach or suggest at least the feature of the electrode pattern being completely embedded within the seal pattern, as set forth in independent claim 1, as newly-amended.

As shown on the right, FIG. 4 of *Sawatsubashi et al.* is a cross sectional view of the arrangement of *Sawatsubashi et al.* In particular, the seal member (108) of *Sawatsubashi et al.* contacts the substrates (101 and 102)

and overlaps with element (113). In the description, *Sawatsubashi et al.* discloses that “[e]ach of the drain line driving circuits 112 and the gate line driving circuit 113 comprises an



**FIG. 4**

integrated circuit which has a plurality of thin film transistors... Each of the drain line driving circuit 112 and the gate line driving circuit 113 has an outer edge overlapped with the seal member 108 and has an inner edge extending in the region in which the liquid crystal 109 is sealed. (emphasis added)” Column 4, lines 58-66 of *Sawatsubashi et al.* Thus, element (113) of *Sawatsubashi et al.* is not an electrode pattern, as set forth in Applicants’ claimed combination. Moreover, it is respectfully submitted that even assuming that element (113) of *Sawatsubashi et al.* were an electrode pattern (which Applicants disagree), the element member (113) of

*Sawatsubashi et al.* is not completely embedded within the seal member (108).

Further, it is respectfully submitted that *Wakai et al.* is not relied upon as teaching an electrode pattern or a seal pattern. In addition, it is respectfully submitted that *Wakai et al.* also fails to teach or suggest the claimed combination as set forth in independent claim 1 including at least “a seal pattern formed peripherally to said active area surrounding the electrode pattern, and contacting said first substrate and said second substrate, wherein the electrode pattern is completely embedded within the seal pattern.” Accordingly, Applicants respectfully submit that *Sawatsubashi et al.* and *Wakai et al.*, whether taken separately or in combination, fail to teach or suggest the claimed combination as set forth in independent claim 1, as newly-amended, including at least “a seal pattern formed peripherally to said active area surrounding the electrode pattern, and contacting said first substrate and said second substrate, wherein the electrode pattern is completely embedded within the seal pattern.”

Since *Sawatsubashi et al.* and *Wakai et al.*, whether taken separately or in combination, fail to teach or suggest every feature of independent claim 1, as newly-amended, it is respectfully submitted that *Sawatsubashi et al.* in view of *Wakai et al.* do not render claim 1 unpatentable. Further, since claims 2, 5-8 and 23 depend from claim 1, it is respectfully submitted that *Sawatsubashi et al.* in view of *Wakai et al.* also do not render claims 2, 5-8 and 23 unpatentable.

In addition, it is respectfully submitted that dependent claims 2, 5-8 and 23 are allowable also because *Sawatsubashi et al.* in view of *Wakai et al.* fail to teach or suggest features of these claims. For instance, it is respectfully submitted that *Sawatsubashi et al.* in view of *Wakai et al.*, whether taken separately or in combination, fail to teach or suggest the claimed combination as set forth in claim 7 including at least “wherein said electrode pattern forms an electric field with said common electrode,” and the claimed combination as set forth in claim 8 including at least

“wherein said electrode pattern is applied with a constant DC bias voltage.” Moreover, it is respectfully submitted that *Sawatsubashi et al.* and *Wakai et al.*, whether taken separately or in combination, fail to teach or suggest the claimed combination as set forth in claim 23 including at least “wherein said electrode pattern contacts only said seal pattern and said protective film.”

In light of the above, withdrawal of the rejection of claims 1, 2, 5-8 and 23 under 35 U.S.C. §103(a) is respectfully requested.

### **Conclusion**

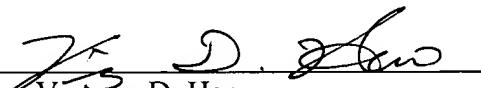
In view of the foregoing, withdrawal of the rejections and allowance of the pending claims are earnestly solicited. Should there remain any questions or comments regarding this response or the application in general, the Examiner is urged to contact the undersigned at the number listed below.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,  
**MORGAN, LEWIS & BOCKIUS LLP**

Dated: December 18, 2003

By:



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